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G-000-711.2

**MONTHLY PROGRESS REPORT FOR PERIOD
ENDING JUNE 30, 1987**

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ENCLOSURE

MONTHLY PROGRESS REPORT FOR PERIOD ENDING JUNE 30, 1987

2661

SUMMARY

Work activities associated with the Federal Facilities Compliance Agreement (FFCA) have continued during the month of June. The Characterization Investigation Study (CIS) to support a sitewide Environmental Impact Statement (EIS) has continued and quarterly reports of particulate emissions and liquid discharge sampling results have been prepared and transmitted to the U.S. Environmental Protection Agency (USEPA). Final comments on the Remedial Investigation and Feasibility Study (RI/FS) work plan were received from U.S. EPA on 6/30/87. Authorization to proceed with well installation, under the RI/FS, was requested from U.S. EPA.

INTRODUCTION

As an integral part of the agreement between the U. S. Department of Energy (DOE) and the U. S. EPA signed on July 18, 1986, monthly reports are to be provided by the DOE to the EPA with regard to the progress made to meet the provisions stipulated by the agreement. This report fulfills that requirement by describing actions undertaken at the Feed Materials Production Center (FMPC) during the period of June 1 through June 30, 1987.

WORK ASSIGNMENTS AND PROGRESS

The status of the ongoing and completed work in support of the FFCA is summarized in Table 1. Additional descriptions of the work being performed and attendant progress is given in the following paragraphs that are referenced to the pertinent sections of the Compliance Agreement.

• Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

Section 1.A

Comments on section 1.A received from U.S. EPA on June 2, 1987. A Task Force of FMPC personnel from impacted organizations was formed to respond to comments and revise SOP's. Target date for revision of SOP's established at July, 1988.

Section 1.B

The original CERCLA 1.B deliverable was submitted on August 17, 1986. This submittal was revised to incorporate U.S. EPA comments and resubmitted January 21, 1987. A second set of U.S. EPA comments, generated by PRC, were received on June 2, 1987. U. S. EPA comments on the revised deliverable have not been received. An updated deliverable will be issued upon receipt of the comments on the January 21, 1987 submittal.

Section 2.C

Work on this section is complete.

Section 2.D

The site-wide RI/FS Work Plan was transmitted to U.S. EPA December 19, 1986. Draft comments were received from U.S. EPA on May 14, 1987. Final comments received 6/30/87. Authorizations to proceed with installation of 45 wells under the RI/FS was requested from U.S. EPA. Installation is targeted to begin in mid July, 1987.

Progressive actions continued on the Characterization Investigation Study (CIS) being performed in support of the sitewide Environmental Impact Statement and the RI/FS.

- o Field activities in support of the CIS are complete. Collected samples have been transferred to Weston analytical and TMA Eberline for chemical and radiological analysis, respectively.
- o Chemical analysis approximately 75 percent complete. Radiological analysis approximately 20 percent complete.
- o Collected surface radiological and geophysical data have been transferred to the Data Management System.
- o Final reporting task under the CIS has been initiated. Final report tentatively scheduled to be completed by September 30, 1987.

• Clean Air Act (CAA)

Section B - Items 1 through 4

FFCA comments in this section were resolved with the transmittal of the thirty day deliverables to U.S. EPA - Region V.

A May 12, 1987 letter from William D. Franz to James A. Reafsnnyder stated that the FMPC air monitoring network should be reevaluated for its ability to measure representative concentrations of air pollutants. An evaluation of this type was performed in December 1986. Corrective actions resulting from the evaluation are underway. A letter describing the results of the evaluation and the corrective actions currently underway has been completed and will be transmitted to U.S. EPA in July, 1987.

Section D.1

An annual stack testing schedule was developed and transmitted to EPA on December 12, 1986. A response to EPA review comments on this section has been issued.

Section E.2

The initial monthly particulate emissions report from the stacks of FMPC facilities was transmitted to the EPA on December 12, 1986. The initial report furnished data for the period from January through October, 1986. The second²

quarterly particulate emission report for the period November, 1986 through February, 1987 was transmitted to the EPA on April 20, 1987. The third quarterly particulate emission report for March through May 1987 is in the process of being transmitted.

Sections F and G

Work on these sections is complete.

• Resource Conservation and Recovery Act (RCRA)

Section A - Items A.1 through A.7 and Section B - Items B.1 through B.5

U.S. EPA - Region V provided comments on Sections A and B in December 1986. Both Sections were revised to reflect U.S. EPA comments. The revised Section A was transmitted to the U.S. EPA on January 23, 1987. The revised Section B was transmitted to U.S. EPA on January 28, 1987.

A May 12, 1987 letter from William D. Franz to James A. Reafsnider provided a second round of U.S. EPA comments on these revised FFCA deliverables. Actions are currently underway to resolve U.S. EPA comments. Response to be transmitted to U.S. EPA in August, 1987.

Section C with Items C.1 and C.2

The FMPC has developed a final closure plan for the Pit #4 landfill. The FMPC is targeting transmittal of this plan to the U.S. EPA July 30, 1987.

• Radiation Discharge Information

Section A with Items A.1, A.2, and A.3

The FMPC off-site environmental monitoring program and the associated quality assurance plan were provided to the U.S. EPA in August 1986. A May 12, 1987 letter from William D. Franz to James A. Reafsnider provided U.S. EPA comments on these documents. Actions are currently being taken to address the U.S. EPA comments.

The results from monitoring continuous liquid discharge samples are to be reported on a quarterly basis. The initial report for the period from January through October, 1986 was transmitted to EPA on December 12, 1986. The quarterly report for the period November 1986 through February 1987 was transmitted April 20, 1987. The quarterly report for the period March, 1987 through May, 1987 is in the process of being transmitted.

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
30-Jun-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS

CERCLA ACTIONS			
1.A	Develop and implement O&M procedures and work practices to control radioactive emissions, including radon gas and decay products.	60 days	Comments received June 2, 1987. SOP's in process of being revised.
1.B.	Develop and provide to EPA a plan and implementation schedule for the control of radon at the K-65 silos.	30 days	Revised deliverable was transmitted to EPA on January 23, 1987. Second set of comments on original 17-Aug-87 submittal received 02-Jun-87.
1.C.	Implement radon control plan approved by the EPA.	----	
2.A.	RI/FS work to be conducted in accordance with EPA guidelines.	NA	
2.B.	-- No Action Required --	----	
2.C.	Provide to EPA analysis results for laboratory certification ---- SOW Task 7b.	45 days	Completed. EPA requests assurance that the labs will accept radioactive samples. Verified January 23, 1987.
2.D.	Submit to EPA Work Plan for a complete sitewide RI/FS.	90 days	Work plan transmitted December 19, 1986. Supporting documents transmitted on January 30, 1987. Draft comments received 14-May-87. Final comments received 30-Jun-87.
	Amend and submit revised RI/FS work plan to EPA if deficiencies are found.		Draft comments received 14-May-87. Final comments received 30-Jun-87.
CLEAN AIR ACT			
A.	-- No Action Required --	----	
B.1.	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.

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STATUS OF ACTIONS AS OF 30-Jun-87			
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B.2.	Establish and implement administrative controls for real-time monitors to ensure any unplanned releases will be detected and dealt with in 24 hours.	30 days	Completed.
B.3.	Establish and implement sample collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.	30 days	Completed.
B.4.	Establish schedule for the installation of emission controls and prepare annual progress report on replacement of control devices.	30 days	Completed.
B.5.	Respond to U.S. EPA comments on Air Monitoring Network WDF-JAR dated 12-May-87.		Response in preparation. Letter to be transmitted to U.S. EPA in July, 1987.
C.	-- No Action Required --	----	
D.1	Provide EPA yearly stack-testing schedule.	yearly	Completed.
D.2	Provide EPA stack-test results for stacks tested that year.	45 days after test	Initial stack to be tested August 1987.
E.1	Maintain records of monthly particulate matter emissions.	----	Continuing.
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	Initial report transmitted on December 12, 1986. Second report issued on April 20, 1987.
F.	Provide EPA list of environmental air monitoring equipment, including location and the O&M program.	60 days	Completed.
G.	Develop and provide EPA an O&M program for air pollution control devices.	90 days	Completed.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
30-Jun-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
RCRA			
A & B	Respond to USEPA comments in Items A.1. - A.7. and Items B.1. - B.5. WDF-JAR dated 12-May-87.		In process. Response to be transmitted to U.S. EPA in August, 1987.
A.	Achieve compliance with interim status regulations.	30 days	Revisions to the A1-A7 submittals transmitted on January 23, 1987.
A.1.	Conduct hazardous waste determination on all waste streams.	30 days	Completed.
A.2.	Commence a hazardous waste analysis program.	30 days	Completed.
A.3.	Update of operating records pursuant to 40 CFR 265.73 and 265.309.	30 days	Completed.
A.4.	Include full name and signature and date received on manifests pursuant to 40 CFR 265.71.	30 days	Completed.
A.5.	Update the facility closure plan to reflect the year the facility expects to begin closure.	30 days	Completed.
A.6.	Begin collection of all run-off from the active portions of pit 4.	30 days	Completed.
A.7.	Prepare and maintain outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to EPA for approval a detailed groundwater monitoring plan.	90 days	Complete.
B.1.	Determine groundwater flow at the RCRA regulated units.	90 days	Completed.
B.2.	Provide map showing location of all RCRA monitoring wells.	90 days	Completed.

TABLE 1.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
30-Jun-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
B.3.	Include design and construction specs for all RCRA wells.	90 days	Completed.
B.4.	Monitor for all Appendix VIII constituents, including radionuclides.	90 days	Completed.
B.5.	Include a sampling and analysis plan to meet 40 CFR 265.92.	90 days	Completed
C.1.	Develop a closure plan for the landfill pursuant to 40 CFR 265.112.	60 days	In process. Plan to be transmitted to U.S. EPA in July, 1987.
C.2.	Develop a post-closure plan for the landfill pursuant to 40 CFR 265.118.	60 days	To be developed following RI/FS.

RADIATION DISCHARGE INFORMATION

A.	Respond to USEPA comments on Items A.1. - A.3. WDF-JAR dated 12-May-87.		In process.
A.1	Provide EPA with existing offsite environmental monitoring program.	30 days	Completed.
A.2	Provide EPA the QA program associated with the environmental monitoring program.	30 days	Completed.
A.3	Report to U.S. EPA, OEPA and Ohio Department of Health the results of the continuous liquid discharge samples.	quarterly	Initial report transmitted on December 12, 1986. Second report transmitted April 20, 1987.